

## State Water Resources Control Board

January 5, 2017

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7017 2680 0000 6289 5043**

Mr. Mike Johnson  
Senior Plumber / DSO  
Department of General Services  
5560 Overland Avenue, Suite 410 M.S. 0-366  
San Diego, California 92123-1294  
[mike.johnson@sdcounty.ca.gov](mailto:mike.johnson@sdcounty.ca.gov)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM  
LOCATED AT SAN DIEGO COUNTY CENTRAL JAIL, 1173 FRONT STREET,  
SAN DIEGO**

Dear Mr. Johnson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on December 14, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Monitoring Plan</b> – The monitoring plan in CERS must be updated because the recordkeeping section lists “no” for equipment maintenance and calibration records; however, it should list “yes.”	32930	December 14, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)
2	<b>Failure to Continuously Monitor Emergency Generator Piping</b> – For pressurized emergency generator systems without a line leak detector, daily inspection logs and an annual 0.1 gallon per hour pressurized line test are required. The daily inspection logs and pressurized line test results were not available at the time of inspection.	32930	December 14, 2017	Ongoing	23 CCR 2636(f)(4) and(6)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	<b>Failure to Maintain Tank Information Form</b> – In CERS, the primary product piping is listed as fiberglass; however, steel piping was observed during the inspection.	32930	December 14, 2017	Ongoing	23 CCR 2711(a)
4	<b>Failure to Maintain Facility Information Form</b> – The facility information form lists Mr. Kenneth Johnson as the tank operator. However, Mr. Johnson is the designated operator, not the tank operator. The form must be updated to identify the County of San Diego as the tank operator.	32930	December 14, 2017	Ongoing	23 CCR 2711(a)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and County of San Diego Department of Environmental Health within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance. Please upload the current financial responsibility documents that were observed onsite into the CERS database.**

Please send all compliance documentation to the following:

**State Water Board**

Mr. Douglas McDevitt  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[douglas.mcdevitt@waterboards.ca.gov](mailto:douglas.mcdevitt@waterboards.ca.gov)

**Local CUPA**

Mr. Robert Rapista  
Supervising Environmental Health Specialist  
Underground Storage Tank Program  
County of San Diego Department of  
Environmental Health  
P.O. Box 129261  
San Diego, California 92112-9261  
[robert.rapista@sdcounty.ca.gov](mailto:robert.rapista@sdcounty.ca.gov)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: See next page

cc: (via email only)

Ms. Maryam Dorsey, Chief  
Hazardous Material Division  
County of San Diego Department  
of Environmental Health  
[maryam.dorsey@sdcounty.ca.gov](mailto:maryam.dorsey@sdcounty.ca.gov)

Mr. Robert Rapista  
Supervising Environmental Health Specialist  
Underground Storage Tank Program  
County of San Diego Department  
of Environmental Health  
[robert.rapista@sdcounty.ca.gov](mailto:robert.rapista@sdcounty.ca.gov)

Mr. Ronald Rudd  
Facility Support Manager  
Department of General Services  
[ronald.rudd@sdcounty.ca.gov](mailto:ronald.rudd@sdcounty.ca.gov)